

**UNITED STATES COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ANDREW K. MITCHELL.**

**Defendant.**

**Case No. 2:19-CR-53**

**JUDGE SARGUS**

**JOINT PROPOSAL OF SCHEDULE FOR TRIAL**

Consistent with this Court’s June 27, 2023 Order, the parties hereby file this joint proposal of schedule for trial. The parties have agreed that the proposed schedule set forth below can be applied to the January 8, 2024, trial date already selected by this Court.

The parties have agreed to the following trial deadlines and urge the Court to incorporate them in any subsequent Trial Scheduling Order:

- 10 weeks from trial date – all motions to suppress and/or sever (Govt 14 days to respond)
- 8 weeks from trial date – any proposed jury questionnaire topics/questions
- 6 weeks from trial date – written notice of experts from all parties
- 3 weeks from trial date – jury instructions submitted
- 2 weeks from trial date – disclosure by Govt of “sensitive Jencks” materials

Ultimately, the parties will abide by the trial scheduling chosen by this Court and we appreciate the opportunity to provide the above suggestions.

Respectfully submitted,

UNITED STATES ATTORNEY  
KENNETH L. PARKER

s/Kevin W. Kelley  
KEVIN W. KELLEY (0042406)  
NOAH R. LITTON (0090479)  
Assistant U.S. Attorneys

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Joint Proposal of Schedule for Trial was served on attorneys for defendant Mitchell (Mark C. Collins and Kaitlyn Stephens) via this Court's ECF system on July 10, 2023.

s/Kevin W. Kelley  
KEVIN W. KELLEY (0042406)  
Assistant U.S. Attorney